





To inspire, enrich and nurture so each individual reaches their full potential

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Pecuniary Interest Policy

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To be reviewed annually in the Spring Term

Next Review: January 2027

History of Document

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Issue 1	February 2022	Lauretta Baker	Trust Board	Policy created in reference to NGA and the Trust Academy Handbook
Issue 2	February 2023	Victoria Hobson	Trust Board	Content reviewed, no changes required. <ul style="list-style-type: none">Appendix B and C removed due to registers needing to be created in Excel not WordAppendix A changed to One and statement added to allow for electronic collection of declarations
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1. Introduction

Schools manage a significant proportion of public funds and must demonstrate that no trustee, member, employee, or related party benefits personally from the use of funds.

Financial decisions must be seen to be made in accordance with the [Seven Principles of Public Life](#):

Selflessness: No financial gain or other material benefits for self/family

Integrity: Independent of outside influence

Objectivity: Decision made on merit

Accountability: Accountable for decisions/actions to the public

Openness: Open about decisions and actions taken wherever possible

Honesty: Declare private interests, resolve conflicts to protect public interest

Leadership: Promote and support principles by leadership and example

Paras 1.45 to 1.48 of the 2025 Academy Trust Handbook states:

Register of Interests [minor changes]

1.45. The trust must keep a register of any relevant business and financial interests, for (as a minimum) members, trustees, local governors and senior employees, serving at any point over the past 12 months.

1.46. The register must include their full names, date of appointment, who appointed them and their term of office (for trustees and local governors), date they stepped down (where applicable), and relevant business and financial interests including:

directorships, partnerships and employments with businesses
trusteeships and governorships at other educational institutions and charities
for each interest: the name and nature of the business, the nature of the interest and the date the interest began

1.47. The register must identify relevant interests from close family relationships between the academy trust's members, trustees or local governors. It must also identify relevant interests arising from close family relationships between those individuals and employees.

1.48. Trusts should consider whether other interests should be registered, and if in doubt should do so. Boards of trustees must keep their register of interests up-to-date at all times.

2. The Purpose

The purpose of this guidance and this policy is to ensure that decisions made in terms of appointing staff, spending the school's money etc. are in no way influenced by personal interests; and also to provide openness and transparency to parents and the wider public. Without such a framework of accountability the actions of staff and trustees could be open to question.

By registering and declaring interests, individuals are ensuring that other people involved in decision making know from the outset that there could be a potential conflict of interests, and can ensure that the individual concerned takes no part in the process.

The policy conforms to the requirements set out in the Academy Trust Handbook and will be updated promptly whenever the trust receives any changes to Regulations.

This policy will be issued to all new staff, members and trustees and will be readily accessible to all existing staff, members and trustees.

3. School Policy

The Trust Board has adopted a policy which includes all the requirements set out in the Academy Trust Handbook.

The Trust Board will maintain a register which lists for each member of the Trust Board, the Principal and school staff:

- Any business interests they or any member of their *immediate family*¹ have;
- Details of any other educational establishments that they govern;
- Any relationships between school staff and members of the Trust Board;
- The register will be kept up to date with notification of changes, through annual review of entries and reviewed annually by the Trust Board;
- The register will be available for inspection by members, trustees, staff and parents;
- The register will be published on the school website (a publicly accessible website).

Business interest's/nil returns of school staff may be omitted from the published copy unless they are also members, trustees or the Principal, in which case they must be included in the published copy.

¹ Immediate family includes other relatives and individuals who may exert influence

Staff, members and trustees must be given an opportunity to declare an interest in any item on the agenda of a meeting and must withdraw from the meeting for relevant agenda items.

4. Individual Declarations

Each member, trustee and member of staff is responsible for:

- Making complete declarations at least annually, and for ensuring that their declaration is up-to-date;
- Disclosing an interest and withdrawing from meetings/activities where appropriate.

Each member of the Trust Board and school staff must complete and sign the trusts '*Declaration of Pecuniary and Personal Interest*' form annually (Appendix One).

'Nil' should be used to indicate where no interest exists.

All interests and connections which could influence the school's reputation with the public should be registered, including:

- Details of any other educational establishment where the individual is a governor, associate member or trustee;
- Personal relationships with other members of staff or trustees of the school, including spouses, partners and relatives;
- Details of charities where the individual is a trustee;
- Details of membership of professional bodies, membership organisations, public bodies or special interest groups where the individual is a member and has a position of general control or management.

Relevant business interests where the individual, or an immediate family member (to include other relatives and individuals who may exert influence) have a financial, or other, interest in a business or organisation which could feasibly be in a position to support goods/services to the other school should be registered, including:

- Building, catering and other premises/grounds contractors;
- Suppliers of stationery and equipment;
- Transport contractors;
- Service providers (including audits for school funds).

Relevant business interests where the individual is a director, partner or shareholder should be registered. Only relevant interests need to be included but not for example being a small shareholder in a large national company.

Declarations should be clearly recorded so that there can be no potential for misunderstandings. Everyone must use the '*Declarations of Pecuniary and Personal Interest*' form provided by the trust. The school will print copies when needed. The forms must be completed annually; and more frequently whenever changes in circumstances have taken place.

If a new interest becomes applicable during the school year then it is the responsibility of the individual member, trustee or staff member to request a new '*Declarations of Pecuniary and Personal Interest*' form from the School Business Manager.

It may be appropriate that the requirement to complete the declaration goes beyond just staff, trustees and members. The Principal will decide who else should be considered as an interested party in order to extend the requirement to additional individuals who have significant contact and/or influence with the school.

The trust recommends that interest are declared if the individual is unsure. Specific issues can be discussed with the Principal, Chair of Trustees of School Business Manager.

5. General Interests Register

The Principal will maintain an up-to-date General Interests Register.

The Register must contain individual entries from each trustee and member of staff; each entry will be sequentially numbered.

The Register will include:

- The Name of the member/trustee or member of staff;
- Their position(s) (trustee, job title etc);
- Names of potential interests/business
e.g. name of a close relative who works at the school;
- Name of interest(s) and business
e.g. 'spouse employed as Bursar' or 'company director';
- Trading address of business;
- Date interest(s) start and end;
- Date the most recent form was signed;
- Confirmation as to whether the information can be withheld from the published copy;
- Details of who updated the Register and the date.

The Register will be recorded using Excel in order that declared interests and nil returns can be filtered to assist at meetings.

6. Publishing the Register

The Trust Board is responsible for publishing the Register; the Principal will ensure that the statutory information is prepared ready for publication on a publicly accessible website.

- The Register will be available for inspection at the school by members of the public, parents and staff;
- The Register will also be made available on the school website in a readily accessible form (i.e. not in a document that has to be downloaded). It will be expanded to include other trustee details that must be published.
- Business interests'/nil returns of school staff may be omitted from the published copy unless they are also members, trustees or the Principal, in which case they must be included.

7. Withdrawing from Meetings

The general principle is that no-one should be involved in a decision where his or her personal interests may conflict with those of the Trust Board's or the school:

- The regulations apply to all members of the Trust Board and the Principal and any others in attendance at meetings;
- If a matter is to be voted upon, then no-one with a pecuniary or business interest should be present when the vote is taken;
- Trustees nominated for Chair of the Trust must withdraw when the election of Chair is being considered and voted upon. The same principles apply for the election of the Vice Chair;
- Trustees must withdraw where their own appointment, reappointment or removal as a member of the Trust Board is under consideration;
- The Principal must withdraw from any meeting where his/her own pay or performance appraisal is under discussion;

- Any trustee or member who is employed to work at the school (other than the Principal), must withdraw from a meeting where the pay or performance appraisal of any particular person employed to work at the school is under discussion;
- Any trustee or member who has a child at the school must withdraw from any meeting where the outcome of discussions/decisions could potentially directly affect their child;
An example would be for a parent trustee to withdraw from a Pupil Discipline Committee meeting where discussions will concern a child in the same class as the trustee's child.

8. Disclosing an Interest and Withdrawing

If any person has any pecuniary or business interest, direct or indirect, in any contract, proposed contract or any other matter under discussion at a meeting or an activity that the school is undertaking, or planning to undertake then they must disclose the fact and:

- Withdraw from a meeting during the consideration or discussion of the matter;
An example would be for a trustee to withdraw from a selection panel where the trustee has disclosed links to a potential candidate;
- Not take part in the vote on any question related to the matter;
- Not take part in any financial activity connected to the matter;
An example would be a school employee with disclosed links to a local coach company not becoming involved in any part of the process of hiring and paying for coaches for school trips. Another example would be a trustee with a pecuniary interest in a potential contract not taking part in drawing up the specification and/or tender document.

An entry must be recorded in the Specific Events Register each time a withdrawal has occurred.

8.1 How to disclose

If the person making the declaration is only one of a number participating in the decision, the declaration must be made to the other participants.

If the person making the declaration is the only person making the decision, the declaration must be made to the Principal.

If the person making the declaration is the Principal, the declaration must be made to the Chair of the Trust. The declaration must be made in writing unless made at a meeting where official minutes are being taken.

9. Specific Events Register

The Trust Board will maintain a Specific Events Register; the administration of this is delegated to the Principal. An entry must be made each time an event occurs, each entry should be sequentially numbered and the minimum information that must be recorded includes:

- The date of the event;
e.g. date of trust meeting, date an order was made;
- A description of what was disclosed and in what circumstances;
e.g. at the trust board meeting on ...;
- A cross-reference to an entry in the General Interests Register (if applicable);
- Date the entry was made in the Specific Events Register;
- The Principal or Chair must sign and date each entry.

There may be occasions where participation is unavoidable. In these situations, the risks will be considered by the Chair of the Trust (or the whole Trust Board if the situation relates to the Chair or the Principal).

An entry will be made in the Special Events Register to record the outcomes of the consideration. The outcome will also be recorded at the next Trust Board meeting.

10. Whole Governing Trust Reviews

The Trust Board will review the General Interests Register on an annual basis. The Principal will maintain a record to show when the reviews took place.

The General Interest Register will be available at every meeting of the whole Trust Board; and for committee meetings where appropriate.

11. Non-Compliance

The school is potentially at risk of significant damage to its reputation should anything go wrong and fall into the public domain as a result of an individual failing to declare an interest or failing to withdraw from meetings or activities where they have an interest.

The school's Whistleblowing Policy must be followed where there are concerns that a pecuniary or business interest has not been declared and an individual or their 'immediate family' may have subsequently benefitted. It is the responsibility of all taking part in meetings and/or activities to ensure that no-one with an interest is present.

Any person failing to reveal information to enable the Trust Board to fulfil its responsibilities may be in breach of the Code of Conduct and as a result be bringing the Trust Board into disrepute. In such cases the Trust Board will consider suspending the individual.

Any member of staff found to be withholding information may be subject to disciplinary action.

12. Monitoring Arrangements

This policy will be reviewed annually by the School Business Manager. At every review, this policy will be reviewed by a trustee and recommended for approval by the Full Trust Board. The approval of this policy cannot be delegated to a committee.

Appendix One – Declaration of Pecuniary and Personal Interest

N.B. The School Business Manager may choose to create an electronic version of this form (e.g. using Microsoft Forms) to support with the annual collection and collation of declarations. Any member of staff unable to access an online version can still use the below form.

Full Name:	
Role:	

I _____, declare as a staff member/trustee/member (please detail) of Hatfield Community Free School that I hold the following personal and/or pecuniary interest(s):

Pecuniary interests	Please provide details of the interest
Current employment	
Businesses (of which I am a partner or sole proprietor)	
Company directorships – details of all companies of which I am a director	
Charity trusteeships – details of all companies of which I am a trustee	
Membership of professional bodies, membership organisations, public bodies or special interest groups of which I am a member and have a position of general control or management	
Gifts or hospitality offered to you by external bodies while acting in your position as a governor/trustee and whether this was declined or accepted in the last 12 months	
Contracts offered by you for the supply of goods and/or services to the trust/school	

Any other conflict	
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Personal interests	Name	Relationship to me	Organisation	Nature of the interest
Immediate family/close connections to governor/trustee				
Company directorships or trusteeships of family/close connections to governor/trustee				

If you are a governor or trustee of any other schools and/or academies, please provide details below:

Name of school/academy	
Position held	
Date appointed/elected to post	
Date of termination to post	

To the best of my knowledge the information supplied above is correct and complete. I understand that it is my responsibility to declare any conflict of interest/loyalty, business or personal that relates directly or indirectly, to myself or any relation in any contract, proposed contract or other matter when present at a meeting at the school where such contact or matter comes under consideration. I understand that I must withdraw from any meeting during the discussion of such contract or matter and must not vote in respect of it.

I agree to review and update this declaration annually and give consent for the information provided to be used in accordance with the trust/school's conflicts of interest policy.

Signed:	
Date:	

Upon completion, this signed form should be given to the School Business Manager.

Guidance Notes

Members, trustees and staff have a legal duty to act in the best interests of their school. Where a situation arises in which they cannot do this due to a personal interest they have, steps should be taken to identify, prevent and record the conflict. This ensures members, trustees or staff are acting in the best interests of the school.

In the declaration above, you must provide details relating to:

- *Your ownership or partnership of a company or organisation which may be used by the trust/school to provide goods or services;*
- *Goods or services you offer which may be used by the trust/school;*
- *Any close relation you have to someone who satisfies either of the above;*
- *Any close relationship you have to someone who is employed by the trust/school.*

Declaring your conflicts of interest is a legal requirement within the School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 and for academies, in the Articles of Association and Academy Trust Handbook. However, making an annual declaration does not remove your requirement to make an oral disclosure of interest and temporarily leave the meeting, where the interest is relevant to something being discussed.

Pecuniary Interests

Generally, members, trustees and staff should not participate in any discussions in which they may directly or indirectly benefit from a pecuniary interest, except where the relevant authority has authorised this i.e. articles of association for academies. A direct benefit refers to any personal financial benefit and an indirect benefit refers to any financial benefit you may have by virtue of a relationship to someone who stands to gain from a decision. Both direct and indirect must be declared.

Non-Pecuniary Interests

There may be a non-pecuniary interest whereby the member, trustee or staff does not stand to gain any benefit but a declaration should still be made. For example, this might be where the member, trustee or staff has a family member working in the school. While the member, trustee or staff might not benefit personally, their judgement could be impaired if something was brought up that would affect the family member.

Handling the Conflict

The trust board must make a decision as to whether or not they should take steps to remove the conflict by:

- *Not pursuing the course of action it relates to; or*
- *Proceeding with it in an alternative way which does not give rise to conflict; or*
- *Not appointing the member, trustee or staff in question or seeking to secure their resignation.*

In the minutes of the meeting, the following should be recorded:

- *The nature of the conflict;*
- *Whom it relates to;*
- *Whether a declaration was made in advance of the meeting;*
- *A brief overview of what was discussed;*
- *Whether the person withdrew from the meeting;*
- *How the trust made the decision in the best interests of the school.*